

JAMES P. KEMP, ESQ.
Nevada Bar No. 6375
KEMP & KEMP
7435 W. Azure Dr., Suite 110
Las Vegas, Nevada 89130
(702) 258-1183/(702) 258-6983 fax
jp@kemp-attorneys.com

BARBARA W. GALLAGHER, ESQ.
Nevada Bar No. 5315
KIDWELL & GALLAGHER
790 Commercial Street
Elko, NV 89801
(775) 738-1000/(775-753-8600 fax
barbara@kidwellgallagher.com

Attorneys for Plaintiff EUFEMIA GUILLEN

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EUFEMIA GUILLEN,)
Plaintiff,)
vs.)
B.J.C.R. L.L.C., a Nevada Limited Liability)
Company; B.J.H.S., LLC., a Nevada Limited)
Liability Company; R.C.S.J., LLC, a Nevada)
Limited Liability Company; Dhilan One L.L.C., a)
Nevada Limited Liability Company; CHAMPAK)
LAL, an Individual; and BHARAT B. LAL, an)
Individual,)
Defendants.)

Case No.: 3:20-cv-317-MMD-CSD

**STIPULATION AND ORDER TO
EXTEND BRIEFING ON
DEFENDANTS' MOTION TO
COMPEL (ECF No. 51)**

[FIRST REQUEST]

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendants' Motion to Compel (ECF No. 51) from the current deadline of February 7, 2022 through and including **Tuesday February 22, 2022**. Further, the parties agree that Defendants' deadline to reply to Plaintiff's response will be

1 extended from March 1, 2022 to and including **March 8, 2022** (giving Defendants 14 days to
2 reply rather than 7 days)

3 This is the first request for an extension of this deadline. The parties provide the
4 following information to the Court regarding the proposed extension of time:

- 5 1. Plaintiff's undersigned counsel has informed Defense counsel that an extension
6 to file the response is needed because due to his having been tied up with the
7 response due on a Motion for Summary Judgment that is also due on February
8 7, 2022;
- 9 2. Further, Ms. Gallagher, co-counsel for undersigned was required to travel out
10 of state for a medical appointment the week ending February 4, 2022 and has
11 not been available to work on the opposition;
- 12 3. Further Plaintiff's undersigned counsel has a long-standing family
13 commitment to travel to California with his wife for a milestone birthday she
14 is celebrating on February 8 and 9, 2022, followed by the need to prepare on
15 February 10 and 11 for oral argument on a Ninth Circuit case that is set for
16 February 14 at 9:00 a.m. Immediately after the Ninth Circuit argument
17 Plaintiff's undersigned counsel must travel to Elko, Nevada for depositions on
18 another case that are set for February 15-18, 2022. It will likely be the
19 President's Day weekend before counsel can fully address the Motion to
20 Compel;
- 21 4. Additionally, Defense Counsel has requested an extra week to file a reply to
22 Plaintiff's response and that is reasonable under the circumstances.

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1 This stipulation to extend the briefing deadlines is made in good faith and not for
2 purposes of delay.

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4 DATED this 7th day of February, 2022.

DATED this 7th day of February, 2022.

5 KEMP & KEMP, ATTORNEYS AT LAW

SIMONS HALL JOHNSTON PC

6
7 /s/ James P. Kemp

/s/ Sandra C. Ketner

8 James P. Kemp, Esq.
9 Nevada Bar No. 6375
Kemp & Kemp, Attorneys at Law
10 7435 W. Azure Drive, Suite 110
11 Las Vegas, Nevada 89130
Attorneys for Plaintiff

Anthony L. Hall
Nevada Bar No. 5977
Sandra C. Ketner
Nevada Bar No. 8527
6490 S. McCarran Blvd., Ste. F-46
Reno, NV 89509
Attorneys for Defendants

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15 **ORDER**

16 IT IS SO ORDERED

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19 UNITED STATES MAGISTRATE JUDGE

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21 DATED: February 8, 2022
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